



Ball Corporation

345 South High Street, Muncie, IN 47305-2326 (317) 747-6100

April 5, 1993

Maryland Department of the Environment
Waste Management Administration
2500 Broening Highway
Baltimore, Maryland 21224

RE: Facility Ownership Status
Ball Metal Decorating and Services Division
Baltimore, Maryland

Dear Ladies and/or Gentlemen:

Pursuant to Title 40 CFR 262 Appendix A, a Notification of Regulated Waste Activity form must be submitted for a change in facility ownership.

Ball Metal Decorating and Service, a division of Ball Corporation, will be operated under new ownership effective April 3, 1993. The new name for the division will be **Alltrista Metal Services Company** and the new owner will be **Alltrista Corporation**.

Should you have any questions, please call me at (317) 747-6289.

Very truly yours,

A handwritten signature in black ink that reads "C. Matthew Witte". The signature is written in a cursive style with a large, stylized "C" and "W".

C. Matthew Witte, P.E.
Corporate Environmental Engineer
Corporate Environmental Practices

RECEIVED
APR 8 1993
DIVISION

Sheet MET. COATING & Lithog Co Gen

FY91 COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: MIDD19191018112181691 4. Data Entry
2. Name: Ball Metal Decorating and Service Division New ☒
3. Address: 901 W. Ostend Street, Baltimore, MD Update ☒
Zip 21230
5. Date of initial evaluation: 03/06/91 5a. Responsible E=EPA O=Other
Agency 15 S=State B=Con/St
C=Con/EPA X=Oversite
6. Type of Evaluation: 105 1=CEI 4=CME
Covered by this Report 2=Sampling Insp 5=Comp Sched Eval
3=Record Review 11=Case Devel Insp
12=O&M Inspection
7. Date of Eval covered by report: 03/19/91 13=CA Oversight Insp
(If different from 5.)

7a. Eval comments: RCRA follow-up

8. CLASS & VIOLTNs	Class of Violatn	GWM	C/PC	F	R	PtB	CmpSc	Man	L	B	OTH
<u>KEY</u>											
X=violation, no spec	I										
B=viol & specialty	II							0		0	
S=same violation											
Z=pend determinatn											
O=no violation											
<u>Specialties</u>											
I=no insurance only		X	X	X	X	X	X	X	X	X	
C=CA Schedule Viol		S	S	S	S	S	S	S	S	S	
H=HPV		Z	Z	Z	Z	Z	Z	Z	Z	Z	
*=Class I only		O	O	O	O	O	O	O	O	O	
		H	H	I*	H	C	H	H	H	H	
				B*		B					
				H		H					

8a. Viol Comment: No violations.

9. Enforcement Action:

Class	Area of Violatn	Type (code)	Action Date	Comp Date	Penalty	Resp Agen
				Schd	Assd Coll	(code)
II	Other	03	03/06/91	03/06/91	03/19/91	S

Enf 03=Warn Ltr 11=Filed Civil Act 15=CA In Ad Or Agcy code
Act 04=Admn Complt 12=Filed Criml Act 16=CA Fl Ad Or E=EPA
Type 05=Fl Adm Ord 18=Civil Ref to AG 21=Note nonComp S=State
Code 10=Informal 19=Final Judcl Ord 22=FFCA X=EPA/
23=Federal Facility Referral to Headquarters oversight

10. Enforcement Comment: All corrections required in site complaint SC-0-91-157 corrected as specified.



DEPARTMENT OF THE ENVIRONMENT

2500 Broening Highway, Baltimore, Maryland 21224

Area Code 301 • 631- 3400

William Donald Schaefer
Governor

March 27, 1991

CERTIFIED MAIL

Mr. Mathew Wittie
Ball Metal Decorating and Service Division
901 W. Ostend Street
Baltimore, Maryland 21230

RE: Notice of Compliance

Dear Mr. Wittie:

On March 19, 1991, a representative of the Hazardous and Solid Waste Management Administration conducted an inspection of your facility.

Based on this inspection, it has been determined that the corrective actions noted in Site Complaint SC-O-91-157 that was issued on March 6, 1991 have been completed. You are hereby advised that it remains your responsibility to ensure that your facility is maintained in compliance with Maryland laws and regulations concerning Controlled Hazardous Substance.

This notice is only intended to advise you that the corrective measures that were noted in the issued Site Complaint have been completed. Nothing in this notice shall preclude the Department from seeking punitive fines or requiring additional remedial work if warranted. Should you require any additional information concerning this matter, please contact Ms. Harpreet Singh, Inspector, Hazardous Waste Enforcement Division, at (301) 631-3400.

Sincerely,

Richard Johnson
Section Head
Hazardous Industrial Section

RJ/st

cc: Mr. Richard W. Collins

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

*U.S.G.P.O. 1989-234-555 PS Form 3800, June 1985	Sent to Mr. Mathew Wittie Ball Metal Decorating	
	Street and No. 901 W. Ostend St	
	P.O., State and ZIP Code Balto., MD 21230	
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	
	Return Receipt showing to whom, Date, and Address of Delivery	
	TOTAL Postage and Fees	\$
Postmark or Date 4/8/91		



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA follow-up Date 03/19/91
Facility Name: Ball Metal Recycling and Service Division
Remarks: 901 W. Grand Street, Baltimore, MD 21230

The writer visited the above named facility. The date for the purpose of this report is 03/19/91. The site was visited on 03/06/91. During the inspection the following was found:

On 03/19/91, according to manifest document no. NY15 33503934, 6 DM (330G) of DCL, EPC3 waste were received by Ashland Chemical, Inc. to Ashland Chemical Inc. in Burlington, NY 13902.

Under LDR - The above generator has a copy of Land Ban Mkt/Pkts for the restricted waste.

The above generator has an updated copy of Contingency and Emergency Prepared Plan. Mr. D'Amico gave this writer a copy of Contingency and Emergency Prepared Plan.

In the storage area for hazardous waste 55125 gal. drums were in storage. All the drums were properly labeled, marked, and had date of receipt on them.

All containers placed in site-map. List SC-C-91-157 was on site as specified.

Observer:

[Signature]

Person Interviewed:

[Signature]

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2050-0039 Expires 9/30/91

Please print or type. Do not Staple

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. M D D 9 9 0 8 1 2 8 6 9 5 2 3 9 3		Manifest Document No. 3		2. Page 1 of 1		Information in the shaded areas is not required by Federal Law.					
3. Generator's Name and Mailing Address BALL METAL DECORATING 901 WEST OSTEND STREET BALTIMORE, MD 21230						A. State Manifest Document No. NY B 235239 3							
4. Generator's Phone (301) 837-6800						B. Generator's ID SAME AS #3							
5. Transporter 1 (Company Name) ASHLAND CHEMICAL INC						C. State Transporter's ID 7067Z							
6. US EPA ID Number N Y D 0 4 9 2 5 3 7 1 9						D. Transporter's Phone (607) 723-8254							
7. Transporter-2 (Company Name)						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone ()							
9. Designated Facility Name and Site Address ASHLAND CHEMICAL INC 3 BROAD STREET BINGHAMTON, NY 13902						G. State Facility's ID SAME AS #9							
10. US EPA ID Number N Y D 0 4 9 2 5 3 7 1 9						H. Facility's Phone (607) 723-8254							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. WASTE FLAMMABLE LIQUID N.O.S. (XYLENE, MIBK) FLAMMABLE LIQUID UN 1993 RQ-F003 ASH-71-2687						006 D M		00330		G		EPA F003, D001 STATE	
b.												EPA STATE	
c.												EPA STATE	
d.												EPA STATE	
J. Additional Descriptions for Materials listed Above XYLENE, MIBK 5-15% S.G. 1.1-1.2						K. Handling Codes for Wastes Listed Above							
a.						b		c		d		e	
b.						c		d		e		f	
15. Special Handling Instructions and Additional Information: HAZARDOUS MATERIALS RESPONSE INFORMATION PRESENT A. ADDITIONAL CODE D018 JB DRUMS (ASH-71-2686) NON-REGULATED MATERIAL (WASTE INKSW) "EVERY SPILL, RELEASE OR INCIDENT INVOLVING THIS SHIPMENT MUST BE REPORTED TO CHEMTREC DAY OR NIGHT, AT 800-424-9300."													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name J. TERRY MCGLOTHAN						Signature J. Terry McGlothlan						Mo. Day Year 03/19/91	
17. Transporter 1 (Acknowledgement of Receipt of Materials) Printed/Typed Name Joe L Buskirk						Signature Joe L Buskirk						Mo. Day Year 03/19/91	
18. Transporter 2 (Acknowledgement of Receipt of Materials) Printed/Typed Name						Signature						Mo. Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name													
Signature						Mo. Day Year							

GEN
Sheet Metal Coating & Lithog Co

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name Ball Metal Decorating and Service Division, 901 W. Ostend St
B. Street (or other identifier)
C. City Baltimore D. State MD E. Zip Code 21230 F. County Name Baltimore City

G. Site Operator Information

1. Name Ball Metal Decorating and Service Division 2. Telephone Number (301) 747-6289
3. Street 901 W. Ostend Street 4. City Baltimore 5. State MD 6. Zip Code 21230

H. Site Description

I. Type of Ownership

☐ 1. Federal ☐ 2. State ☐ 3. County ☐ 4. Municipal ☒ 5. Private

J.

☒ 1. Generator ☐ 2. Transporter ☐ 3. Treatment ☐ 4. Storage ☐ 5. Disposal

K. Regulatory Status

☐ 1. Interim Status ☐ 3. Part B Permit Application Submitted
☐ 2. Permitted Facility ☐ 4. Part B Permit Application in Preparation

L. Harpreet K. Singh
1. Principal Inspector Name
Public Health Engineer
2. Title

MDE/HSINMA/HWE
3. Organization
(301) 631-3400
4. Telephone No. (area code and No.)

M. Inspection Participants

1. <u>Mr. C. Matthew Witte</u>	6.
2. <u>Mr. Russell Cunningham</u>	7.
3. <u>Mr. Raddatz</u>	8.
4. <u>Harpreet K. Singh</u>	9.
5. <u>Mr. Joseph J. Sindello</u>	10.

EXHIBIT 2-3. PRE-INSPECTION WORKSHEET

Date Completed	Description of Activity
	Complete and verify the general information section of the inspection report
	Identify and obtain all relevant information:
✓	Manifest history
✓	Notification form
✓	Part A permit application
✓	Previous inspection reports
✓	Correspondence
✓	Part B permit application (if available)
✓	Annual reports
	Other
	Assemble inspection package:
✓	Notification form
✓	Part A permit application
✓	Previous inspection reports
✓	Waste generation and characterization information
✓	Information from air and water pollution control agencies or offices
✓	Inspection checklists
✓	Copies of State statutes and regulations or Federal laws and regulations
✓	Safety equipment
✓	Camera and film
✓	Agency identification card
✓	Sampling equipment (if necessary)
	Other
	Scheduling the investigation:
	Letters of intent to visit/inspect
	Establish date(s) of the inspection
	Follow-up telephone call to confirm date(s) of the inspection and request additional information be made available upon inspection
	Complete inspection plan
	Other



STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(301) 631-3385

FI - 91-03-06-BC-091 Inspector: Harpreet K. Singh Date: 03/06/91

GENERATOR CHECKLIST

Facility Name: Ball Metal Decorating and Service Division

Address: 901 W. Ostend Street, Baltimore, MD 21230

Facility Representative: Mr Russell Cunningham Telephone No.: (301) 747-6289
Mr C. Matthew Witte, Mr Kadatz, Mr Pennillo

Description of Work Activity: Sheet metal coating and printing

EPA Identification Number: M-D-D-9-9-0-8-1-2-8-6-9

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?..... ☒ Yes ___ No
If yes, under which category is the waste?

☒ Ignitable ___ Corrosive ___ Reactive ___ EP Toxic ☒ RCRA Listed

2. Describe the amount of waste generated (day, week or month).

Large quantity generator (>1000 kg/month)

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?..... ☒ Yes ___ No
(If no, do not complete sections B and C)
2. Does generator use manifest?..... ☒ Yes ___ No
If no, explain: _____
3. Does generator retain copies of manifests?..... ☒ Yes ___ No ___ N/A
If yes, does the manifest include the following information?
(26.13.03.04C)
- Manifest document number?..... ☒ Yes ___ No ___ N/A
- Generator's name, mailing address and telephone number?..... ☒ Yes ___ No ___ N/A
- Generator's EPA I.D. number?..... ☒ Yes ___ No ___ N/A
- Transporter name(s) and EPA I.D. number(s)?..... ☒ Yes ___ No ___ N/A
- Designated TSD name, address, and EPA I.D. number?..... ☒ Yes ___ No ___ N/A
- Alternate TSD name, address, and EPA I.D. number?..... ___ Yes ☒ No ___ N/A
- Instructions to return waste to generator if undeliverable?..... ___ Yes ☒ No ___ N/A
- Description of the waste required by DOT regulations?..... ☒ Yes ___ No ___ N/A

Russell Cunningham

- Quantity of each hazardous waste by units of weight or volume?.... ☒ Yes ☐ No ☐ N/A
- Total number and types of containers given to transporter?..... ☒ Yes ☐ No ☐ N/A
- Is the proper certification noted on each manifest?..... ☒ Yes ☐ No ☐ N/A
- 4. Has the generator signed and dated manifests (26.13.03.04E)?..... ☒ Yes ☐ No ☐ N/A
- 5. Did the generator obtain initial transporter's signature and date of acceptance?..... ☒ Yes ☐ No ☐ N/A
- 6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?..... ☒ Yes ☐ No ☐ N/A
- 7. Have manifests been retained for three years?..... ☒ Yes ☐ No ☐ N/A

Section C - Pre-Transport Requirements (26.13.03.05) ☐ N/A

- 1. Does generator package wastes in accordance with DOT requirements?.... ☒ Yes ☐ No
- 2. Are containers in good condition?..... ☒ Yes ☐ No
If no, explain: _____
- 3. Is the date that accumulation time began clearly marked and visible for inspection on each container?..... ☒ Yes ☐ No
- 4. Is period of accumulation less than 90 days?..... ☒ Yes ☐ No
-If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?..... ☒ Yes ☐ No ☐ N/A
-If no, explain: _____
- 5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?..... ☒ Yes ☐ No ☐ N/A
- 6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?..... ☒ Yes ☐ No ☐ N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

- 1. Does the generator keep the following reports for three years?
 - Manifests and signed copies from designated facilities?..... ☒ Yes ☐ No
 - Annual Reports?..... ☒ Yes ☐ No
 - Exception Reports?..... ☒ Yes ☐ No ☐ N/A
 - Waste Analyses?..... ☒ Yes ☐ No ☐ N/A

Section E - Special Conditions (26.13.03.07)

- 1. Has the generator received from or transported to a foreign country any hazardous waste(s)?..... ☒ Yes ☐ No
-If yes, has a notice been filed with MDE and EPA?..... ☒ Yes ☐ No ☐ N/A
-Is this waste manifested and signed by a foreign consignee?..... ☒ Yes ☐ No ☐ N/A
-If generator transported wastes out of the country, has confirmation of delivery been received?..... ☒ Yes ☐ No ☐ N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

- 1. Does the owner/operator maintain personnel training records?..... ☒ Yes ☐ No
If yes, do they include:
 - Job title and written job description of each position?..... ☒ Yes ☐ No
 - Description of type and amount of training?..... ☒ Yes ☐ No
 - Records of training given to facility personnel?..... ☒ Yes ☐ No

Preparedness and Prevention (26.13.05.03)

- 1. Is there evidence of fire, explosion, or contamination of the environment?..... ☒ Yes ☐ No

2. Is the facility equipped with:
- Internal communication or alarm system?..... ☒ Yes ☐ No
 - Telephone or two-way radio to call emergency response personnel?..... ☒ Yes ☐ No
 - Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?..... ☒ Yes ☐ No
 - Water of adequate volume for hoses, sprinklers, or water spray system?..... ☒ Yes ☐ No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?..... ☐ Yes ☒ No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility?..... ☒ Yes ☐ No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?..... ☒ Yes ☐ No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?..... ☐ Yes ☐ No ☒ N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?..... ☐ Yes ☐ No
- If yes, does contingency plan include:
- Arrangements with local emergency response organizations?..... ☐ Yes ☐ No
 - Emergency coordinators' names, phone numbers, and addresses?..... ☐ Yes ☐ No
 - List of all emergency equipment at the facility and description of equipment?..... ☐ Yes ☐ No
 - Evacuation plan for facility personnel?..... ☐ Yes ☐ No
2. Is there an emergency coordinator on site or on call at all times?.... ☒ Yes ☐ No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?..... ☐ Yes ☐ No
4. Has the plan ever been implemented?..... ☐ Yes ☒ No
- If so, was the plan appropriate?..... ☐ Yes ☐ No ☐ N/A
 - If the plan was not appropriate, has it been amended?..... ☐ Yes ☐ No ☐ N/A
 - If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?..... ☐ Yes ☐ No ☐ N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?..... ☒ Yes ☐ No
2. Is container made of a material that will not react with the waste which it stores?..... ☒ Yes ☐ No ☐ N/A
3. Are containers always closed when holding hazardous waste?..... ☒ Yes ☐ No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?... ☒ Yes ☐ No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?..... ☒ Yes ☐ No
6. Do container storage areas have adequate containment systems?..... ☒ Yes ☐ No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?..... ☒ Yes ☐ No ☐ N/A
8. Are incompatible wastes or materials placed in the same containers?... ☐ Yes ☒ No ☐ N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?..... ☒ Yes ☐ No ☐ N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?..... ☒ Yes ☐ No ☐ N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?..... ☒ Yes ☐ No
- If yes, do reports contain the following information?
- a) Name, address and EPA I.D. number of facility?..... ☒ Yes ☐ No
- b) Date and year covered by report?..... ☒ Yes ☐ No
- c) Description/quantity of hazardous waste?..... ☒ Yes ☐ No
- d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?..... ☒ Yes ☐ No
- e) Certification signed by owner/operator?..... ☒ Yes ☐ No

Section G - Other Checklists Completed: N/A

- ☐ Tanks
- ☐ Transporter
- ☒ Land Disposal Restrictions
- ☐ TSD Facility
- ☐ Surface Impoundment
- ☐ Waste Pile
- ☐ Land Treatment
- ☐ Landfill
- ☐ Incinerator
- ☐ Thermal Treatment
- ☐ Groundwater Monitoring

Section H - Additional Comments

PURPOSE:-

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) in order to determine if "Ball Metal Decorating and Service Division" located at 901 W. Stord Street in Baltimore MD 21230 (Baltimore City), is in compliance with Maryland's Controlled Hazardous Substance (CHS) Regulations. In addition to the said inspection Land Ban under Land Disposal Restrictions (LDR) and Toxic Characteristics Leaching Procedures (TCLP) inspections were also

Remediation



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Sequence #

Report of Observations

Type of Inspection/Observations:

RCRA

Date

04/06/91

Facility Name:

Ball Metal Fabricating and Service Division

Remarks:

also conducted.

REPRESENTATIVES PRESENT

Mr. C. Matthew Harte
Mr. Bruce Thompson
Mr. Paul
Mr. Joseph J. Lippello
Harriet K. Singh, Public Health Engineer,
MDE/ENHNA/HINE

OWNER/OPERATOR:-

Ball Metal Fabricating and Service
Division 345 South High Street
Baltimore, MD 21202

FACILITY DESCRIPTION AND BACKGROUND:-

The subject facility is a small metal fabricating and painting shop located at the present address since 1985. The facility employs 150 employees and operates on three operational shifts.

WASTE STREAMS:-

Based on the facility's operation and the information provided, it was found that the following waste streams are generated at the subject facility:-
1. There is an off-gas stream from the metal coating process.
2. There is a sludge stream from the metal coating process.
3. There is a paint sludge stream from the metal coating process.

Observer:

Harriet K. Singh

Person Interviewed:

Paul Thompson



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Page 6 of 15
Sequence # _____

Report of Observations

Type of Inspection/Observations:

Date 24/06/21

Facility Name:

Remarks:

[illegible]

Observer:

Person Interviewed



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Page 8 of 15
Sequence # _____

Report of Observations

Type of Inspection/Observations: _____

Date: 10/11/11

Facility Name: _____

Remarks: _____

RCRII
Mr. Wittic indicated to me that the subject company has an existing permit from the Air & Noise Dept. and permit number 24-00518 and is for the engine from the ten existing and pending ones, which are controlled by their afterburners.

RECORDS DEALING WITH HAZARDOUS WASTE -

A review of the records of the subject company dealing with hazardous waste showed that they had a manifest of hazardous waste sent to EPA ID # MDD970909. A review of records further revealed that the subject company has a manifest for 1991, 1990, 1989 and 1988. Inspection log for the hazardous waste storage is.

Personnel Training Program Periods:
1. Craft of Emergency and Emergency Incident Response.
* Said Program to be recorded by the Emergency Coordinator for 11/11.

Annual Reports for 1989, 1988 and 1987.
Manifests: - A review of the manifests dealing with hazardous waste showed that the subject company is in compliance with the requirements of a permitted facility.

Observer: _____

Person Interviewed: _____



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Page 9 of 15
Sequence # _____

Report of Observations

Type of Inspection/Observations: FCIA

Date: 9/11/91

Facility Name: Fuller, H. H. & Co., Inc.

Remarks: Manifests for 1991-2

Manifest No.	Quantity	Weight	Code	Company	Location
02/22/91 PAC 1013414	5000 G	DOM, FCC3, LORWAC	FC05	Fuller, H. H. & Co., Inc.	PA
* Under LDR - Load DOM Manifest attached to the manifest.					
01/11/91 NDA 1984153	2715 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
Manifests for 1990-					
01/17/90 NDA 1984152	4519 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
11/01/90 NDA 1984151	4906 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
11/1/90 NDA 1984150	4200 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
09/05/90 NDA 1984149	4200 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
09/05/90 NDA 1984148	4200 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					
09/05/90 NDA 1984147	4200 G	DOM, FCC3, Nappi	FC15	Trucking	N.J.
* Under LDR - The owner has not have a load DOM Manifest regarding the restricted waste.					

Observer: Harper, J. A.

Person Interviewed: Ben C. Emerson



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Sequence # 10

Report of Observations

Type of Inspection/Observations:

Date _____

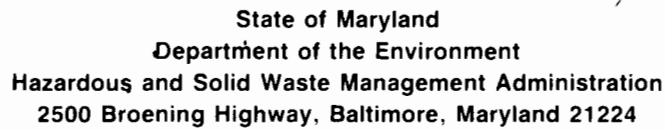
Facility Name:

Remarks:

[illegible]

Observer:

Person Interviewed:



Sequence #_____

Date 5/1/11

Wed Jan 19, 1976 2:10 PM

Noti/Codi. regarding the related waste for
recycle. I will be going ahead with
a new one.

* 26 Dec 1964 - The above participant does not have
and has not been regarding a stated request
for the 2nd date with the above stated
document number.

Observer:

Person Interviewed

Russell Cunningham



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA Date: 03/16/91
Facility Name: Ball Metal Decorating and Service Division
Remarks: TOUR OF THE FACILITY

During the walk thru of the facility I observed twenty (20) 55 gallon drums sorted in the Hall, which are used and are used in the hazardous waste storage area and is located at the south of the building. Each of the said drums had a Hazardous Waste Formable label and had a date of accumulation. Out of 20 x 55 gallon drums, only eight drums had date of accumulation, which was 02/23/91, 03/03/91, 03/14/91, 03/14/91, 07/15/91, 07/15/91, 07/15/91, and 11/31/90. There was no evidence of date of accumulation on the remaining twenty (20) 55 gallon drums. Mr. Harpoot stated to me that the 20 x 55 gallon drums without date of accumulation have been stored for the last two weeks (since the last shipment of hazardous waste). All the 20 x 55 gallon drums are in the building and there was no evidence of leakage. In the C-7 center production area, I observed 2 x 55 gallon drums with the label Hazardous Waste Formable label affixed on them. Each of the said drums had a date of accumulation of 02/23/91. Mr. Harpoot stated to me that the said accumulation of waste is satellite accumulation.

Observer: Harpoot & Singh Person Interviewed: Robert P. Singh



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

CASE # _____

Report of Observations

Type of Inspection/Observation: PCRD Date 11/11/91

Facility Name: Boil Wash & Drying of Tanned Leather

Remarks: In the P-2 Process Area, I observed

five (5) of 55 gallon drums of waste liquid
labeled as "Flammable Liquid" and "Hazardous Waste"
located in the area. The drums were labeled
as a result of having been used
in the process. A sample of the waste
liquid was taken and analyzed. The waste
liquid was found to be a mixture of
leather tanning liquid and water.

In the P-5 Area, I observed
five (5) 55 gallon drums of waste liquid
labeled as "Flammable Liquid" and "Hazardous Waste"
located in the area. The drums were labeled
as a result of having been used
in the process. A sample of the waste
liquid was taken and analyzed. The waste
liquid was found to be a mixture of
leather tanning liquid and water.

In the C-6 Area, I observed
one (1) 55 gallon drum of waste liquid
labeled as "Flammable Liquid" and "Hazardous Waste"
located in the area. The drum was labeled
as a result of having been used
in the process. A sample of the waste
liquid was taken and analyzed. The waste
liquid was found to be a mixture of
leather tanning liquid and water.

TIME IN: _____ TIME OUT: _____

Observer: Hypert Person Interviewed: _____

[Signature]

State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224



Report of Observations

Type of Inspection/Observations: RCRA Date 03/06/91
Facility Name: Ball Metal Decorating and Service Division
Remarks: 701 W. Cotend Street
Baltimore, MD 21230
(301) 837-5800
EPA ID # MDD990812869

The following corrective actions are necessary in order to comply with Maryland's Controlled Hazardous Substance (CHS) Regulations:—

- ① Immediately amend the Emergency and Emergency Procedures Plan and send a copy of the said Plan to HSWMA Office. COMAR 26.13.05.04
- ② Immediately post start accumulation date on the hazardous waste drums. COMAR 26.13.03.05 E (1)(C)
- ③ CHS drums stored in the hazardous waste storage area should meet the aisle space requirements as outlined in COMAR 26.13.05.02 I
- ④ Immediately remove the 2x55 gallon drums of CHS which have been stored over 90 days to a permitted facility by a certified CHS handler. (MDCA No 07/15/90, 11/31/90)
- ⑤ Immediately mail (copy 6 and 7 of the manifest with document no. MDC 0136108 to the Disposer and Generator State respectively.

Observer: Harriet K. Linch Person Interviewed: Matthew Witte



STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(301) 631-3386

SITE COMPLAINT

NUMBER DATE
SC-0- 41-157 03/06/91

1. Name of violator: Ball Metal Decorating and Service Division
Address: 901 W. Camden Street, Baltimore, MD 21230
County: Baltimore City Phone: (301) 237-5800

2. Violation Type (with reference to the Annotated Code of Maryland)

☐ Water Pollution Control and Abatement (Environment Article, Sections 9-30 1 through 9-344)

☐ Oil Control (Environment Article, Sections 4-401 through 4-418)

☒ Controlled Hazardous Substances (Environment Article, Sections 7-201 through 7-268)

☐ Landfills and Sludge Disposal (Environment Article, Section 9-204)
☐ Other

3. Specifically: Contingency and Emergency Procedures Plan needs to be amended COMAR 26.13.04. CUS drums stored without start accumulation date in violation of COMAR 26.13.05(E)(1). CUS drums stored in CUS storage area did not meet the aisle space requirements as stated in COMAR 26.13.05(E)(1). 2X55G CUS drums stored over 10 days without permit, in violation of COMAR 26.13.05(B).

4. You are hereby advised the following corrective actions are necessary. Compliance with the corrective actions contained herein does not preclude the Department from imposing further requirements. In addition, the Department reserves the right to impose sanctions or penalties for the underlying violation(s).

Immediately update Contingency and Emergency Procedures Plan and send a copy of the said Plan to HWMMA office. Relocate accumulation area of CUS drums in storage. Provide sufficient aisle space between the CUS drums. Provide the accumulation area with a permit.

5. The above described violation(s) may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties. Continuation of the violation(s) or failure to take the corrective actions described above may result in additional sanctions or penalties.

6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: Martin W. Walsh, Jr.
Secretary
Department of the Environment

Title: Environmental Engineer
Issued by: Harriet K. Lough
Inspector
Phone: (301) 631-3400

Generator Checklist - Land Ban Inspections

Ball Metal Decorating and Service Division
901 W. Ostend Ave
Baltimore, MD 21230
MDD 990812869

- 268.30 1. Does the facility generate F - solvent wastes (i.e., F001 - F005)? Yes No
- 268.31 2. Does the facility generate Dioxin wastes (i.e., F020, F021, F022, F023, F026, F027 or F028)? Yes No
- 268.32 3. Does the facility generate waste on the California List (see definition below)? Yes No
- Liquid - pH \leq 2 Yes No
- Liquid - PCB \geq 50 ppm Yes No
- Liquid/Non-Liquid - HOC $>$ 1000 mg/l Yes No
- Liquid - Cyanides \geq 1000 mg/l Yes No
- Liquid - Metals as follows Yes No
- | | | |
|----------|-----|----------|
| Arsenic | $>$ | 500 mg/l |
| Cadmium | $>$ | 100 mg/l |
| Chromium | $>$ | 500 mg/l |
| Lead | $>$ | 500 mg/l |
| Mercury | $>$ | 20 mg/l |
| Nickel | $>$ | 134 mg/l |
| Selenium | $>$ | 100 mg/l |
| Thallium | $>$ | 130 mg/l |
- 268.10 4. Does the facility generate any waste on the first third list? Yes No
- If yes, circle the appropriate ones on the attached listing.
- 261.31 5. Is there evidence to indicate that an F001 - F005 solvent waste was misclassified as a listed "U" waste? Yes No N/A
- If yes, describe

6. Does waste analysis data indicate that a soft hammer "F", "K", "P" or "U" listed waste may qualify as a California List waste because of HOC, metals or cyanide content?

Yes

☒ No

N/A

If yes, describe

7. Have any hazardous wastes been reclassified recently from one list code to another thereby impacting its LDR status?

Yes

☒ No

If yes, describe:

- 268.41(b) 8. Does the generator mix restricted wastes having different treatment standards for the same constituent(s) prior to shipping off-site?

Yes

☒ No

If yes, was the most stringent treatment standard for the constituent(s) shown on the notification?

Yes

No

9. Is there evidence to indicate that a treatability group (i.e., wastewater (< 1% TOC) or other) of a F solvent waste was incorrectly determined?

Yes

☒ No

N/A

If yes, describe

10. Is there evidence to indicate that a liquid/non-liquid classification of a California List waste was incorrectly determined (i.e., failure to perform paint filter liquids test)?

Yes No

N/A

If yes, describe

11. Is there evidence to indicate that a wastewater/non-wastewater (>1% TOC and >1% TSS) designation of a first third waste was incorrectly determined?

Yes

No

N/A

If yes, describe

- 268.3 12. Is any restricted waste being diluted as a substitute for treatment?

Yes

No

- 268.7(a) 13. Did the generator determine its waste was restricted from land disposal by

a. testing the waste or an extract of the waste?

Yes

No

b. knowledge of waste and the process from which it was generated?

Yes

No

If the waste is shipped off-site, answer questions 14-17

268.7(a)(1) 14. Does the generator notify the treatment/storage facility of appropriate treatment standards or prohibition levels if waste exceeds these standards/levels?

☒ Yes No N/A

268.7(a)(2) 15. Does the generator submit a notice and certification to the treatment/disposal facility that the waste can be land disposed if it meets the applicable treatment standards or prohibition levels?

Yes No ☒ N/A

268.7(a)(3) 16. Does the generator submit a notice to the treatment/disposal facility that the restricted waste can be land disposed if subject to a case by case extension, an exemption or a nationwide variance?

Yes No ☒ N/A

268.7(a)(6) 17. Has the generator retained in on-site files

a. All data used to support the status of the waste (i.e., restricted or non restricted) including knowledge of waste and test results?

☒ Yes No

b. Copy of waste analysis plan?

Yes ☒ No N/A

c. Copies of all notices and certifications that were sent to treatment/disposal facilities?

(not all. See Report of Observation)
Yes No N/A

Answer the following question if the generator stores on-site a restricted waste

268.50(a)(1) 18. Is the restricted waste stored for accumulation to facilitate proper recovery, treatment or disposal?

☒ Yes No

Answer the following questions if the generator disposes of its soft hammer waste off-site in a landfill or surface impoundment

268.8(a)(1) 19. Has the generator made a good faith effort to locate and contract with treatment/recovery facilities that are practically available and will provide the greatest environmental benefit?

Yes No

If yes, is adequate supportive material available?

Yes No

268.8(a)(2)(i) 20. If a generator determines that there is no practically available treatment for its waste, does adequate documentation exist to substantiate this claim?

Yes No N/A

268.8(a)(2) 21. Did the generator submit a demonstration and certification to the Regional Administrator stating that a good faith effort was made to locate a suitable treatment or recovery facility?

Yes No

268.8(a)(2)(ii) 22. Has the generator actually contracted with such a treatment/recovery facility?

Yes No

If no, answer the following

268.8(a)(3) a. is a copy of the demonstration and/or certification submitted to the disposal facility receiving the waste?

Yes No

268.8(a)(3) b. does the generator retain copies of these demonstrations and certifications?

Yes No

F006*	K073	P084	U077	U248
7	83	87	78	249
8	84	89	86	
9	85	92	89	
19	86	94	103	
K001*	87*	97	105	
4	99*	102	108	
8	100	105	115	
11	101	108	122	
13	102	110	124	
14	103*	115	129	
15*	104*	120	130	
16*	106	122	133	
17		123	134	
18*	P001		137	
19*	4	U007	151	
20*	5	9	154	
21	10	10	155	
22	11	12	157	
24*	12	16	158	
30*	15	18	159	
31	16	19	171	
35	18	22	177	
36	20	29	180	
37*	30	31	185	
44*	36	36	188	
45*	37	37	192	
46	39	41	200	
47*	41	43	209	
48*	48	44	210	
49*	50	46	211	
50*	58	50	219	
57*	59	51	220	
52*	63	53	221	
60	68	61	223	
61	69	63	226	
62*	70	64	227	
69	71	66	228	
71*	81	67	237	
	82	74	238	

* = Not Soft Hammer

SEP-20-1990 08:19 FROM BRIGGS ASSOC., INC.

TO

13018371997 P 01/87

(TCLP)

BRIGGS



400 Hingham Street, P. O. Box 300, Rockland, MA 02370-0389 ▶ (617) 871-8040

FINAL REPORT

PREPARED FOR:

Ball Corp. - *BALTIMORE*

PROJECT NUMBER:

6388

SAMPLE NUMBER:

11342

DATE PREPARED:

September 18, 1990

APPROVED BY:

Leanne E.S. Cobb
Leanne E.S. Cobb
Laboratory Manager

9/20/90
Post-It brand fax transmittal memo 7671 # of pages 7

To	Joe Sonello	From	Chemistry
Co	Ball Corp.	Co	Briggs
Dept.		Phone #	

BRIGGS ASSOCIATES, INC.
400 NINGHAM STREET
ROCKLAND, MA 02370
(617) 871-6040

VOLATILE ORGANICS ANALYSIS
EPA METHOD 624/8240

CLIENT NAME: BALL CORP.
SAMPLE TYPE: WASTEWATER
SAMPLE DATE: 8/29/90
DATE RECEIVED: 8/31/90

PROJECT NUMBER: 6388
DATE OF ANALYSIS: 9/05/90
DATE OF REPORT: 9/18/90
COLLECTED BY: BRIGGS

SAMPLE NUMBER: 11342
SAMPLE LOCATION: BALL CORP. WASTE, BALTIMORE

PARAMETERS

RESULTS IN MG/L
(PPM) -

Acrolein	ND
Acrylonitrile	ND
2-Chloroethylvinylether	ND
Chloromethane	ND
Bromomethane	ND
Vinyl Chloride	ND
Chloroethane	ND
Methylene Chloride	ND
Trichlorofluoromethane	ND
1,1-Dichloroethene	ND
1,2-Dichloroethane	ND
1,2-Dichloroethene	ND
Chloroform	ND
1,1,1-Trichloroethane	ND
1,1,1-Trichloroethane	ND
Carbontetrachloride	ND
Bromodichloromethane	ND
1,1-Dichloropropane	ND
c,t-1,3-Dichloropropane	ND
Trichloroethene	ND
Dibromochloromethane	ND
Benzene	ND
t-1,3-Dichloropropene	ND
1,1,2-Trichloroethane	ND
Bromoform	ND
Tetrachloroethene	ND
1,1,2,2-Tetrachloroethane	ND
Toluene	ND
Chlorobenzene	ND
Ethylbenzene	12,000
Xylenes	110,000
1,3-Dichlorobenzene	ND
1,2-Dichlorobenzene	ND
1,4-Dichlorobenzene	ND

ND = NOT DETECTED

DETECTION LIMIT

375 MG/L

* Estimated value, below quantitation limit.

** U.S. EPA Test Methods for Evaluating Solid Waste. Physical/Chemical Methods.

BRIGGS ASSOCIATES, INC.
400 HINGHAM STREET
ROCKLAND, MA 02370
(617) 871-6040

SEMI-VOLATILE ANALYSIS
EPA METHOD 625/8270

CLIENT NAME: BALL CORP.
SAMPLE TYPE: WASTEWATER
SAMPLE DATE: 8/29/90
DATE RECEIVED: 8/31/90

PROJECT NUMBER: 6388
DATE EXTRACTED: 9/07/90
REPORT DATE: 9/18/90
COLLECTED BY: BRIGGS

SAMPLE NUMBER: 11342
SAMPLE LOCATION: BALL CORP. WASTE, BALTIMORE

PARAMETER	RESULTS IN MG/L	DETECTION LIMIT
PHENOL	ND	2.5
BIS (2-CHLOROETHYL) ETHER	ND	2.5
2-CHLOROPHENOL	ND	2.5
1,3-DICHLOROBENZENE	ND	2.5
1,4-DICHLOROBENZENE	ND	2.5
BENZYL ALCOHOL	ND	2.5
1-2 DICHLOROBENZENE	ND	2.5
2-METHYLPHENOL	ND	2.5
BIS (2-CHLOROISOPROPYL) ETHER	ND	2.5
4-METHYLPHENOL	ND	2.5
N-NITROSO-DI-N-PROPYLAMINE	ND	2.5
HEXACHLOROETHANE	ND	2.5
NITROBENZENE	ND	2.5
ISOPHORONE	ND	2.5
2-NITROPHENOL	ND	2.5
2,4-DICHLOROPHENOL	ND	2.5
2,4-DIMETHYLPHENOL	ND	2.5
BENZOIC ACID	ND	12.5
BIS (2-CHLOROETHOXY) METHANE	ND	2.5
1,2,4-TRICHLOROBENZENE	ND	2.5
NAPHTHALENE	ND	2.5
4-CHLOROANILINE	ND	2.5
HEXACHLOROBUTADIENE	ND	2.5
4-CHLORO-3-METHYLPHENOL	ND	2.5
2-METHYLNAPHTHALENE	ND	2.5
HEXACHLOROCYCLOPENTADIENE	ND	2.5
2,4,6-TRICHLOROPHENOL	ND	2.5
2,4,5-TRICHLOROPHENOL	ND	2.5
2-CHLORONAPHTHALENE	ND	2.5
2-NITROANILINE	ND	12.5
DIMETHYLPHTHALATE	ND	2.5
ACENAPHTHYLENE	ND	2.5
2,6-DINITROTOLUENE	ND	2.5
3-NITROANILINE	ND	12.5
ACENAPHTHENE	ND	2.5

BRIGGS ASSOCIATES, INC.
400 HINGHAM STREET
ROCKLAND, MA 02370
(617) 871-6040

SEMI-VOLATILE ANALYSIS
EPA METHOD 625/8270
CONTINUED

CLIENT NAME: BALL CORP.
SAMPLE TYPE: WASTEWATER
SAMPLE DATE: 8/29/90
DATE RECEIVED: 8/31/90

PROJECT NUMBER: 6388
DATE EXTRACTED: 9/07/90
REPORT DATE: 9/18/90
COLLECTED BY: BRIGGS

SAMPLE NUMBER: 11342
SAMPLE LOCATION: BALL CORP. WASTE, BALTIMORE

PARAMETER	RESULTS IN MG/L	DETECTION LIMIT
2,4-DINITROPHENOL	ND	12.5
4-NITROPHENOL	ND	12.5
DIBENZOFURAN	ND	2.5
2,4-DINITROTOLUENE	ND	2.5
DIETHYLPHTHALATE	ND	2.5
4-CHLOROPHENYL-PHENYLETHER	ND	2.5
FLUORENE	ND	2.5
4-NITROANILINE	ND	12.5
4,6-DINITRO-2-METHYLPHENOL	ND	12.5
N-NITROSODIPHENYLAMINE	ND	2.5
4-BROMOPHENYL-PHENYLETHER	ND	2.5
HEXACHLOROBENZENE	ND	2.5
PENTACHLOROPHENOL	ND	12.5
PHENANTHRENE	ND	2.5
ANTHRACENE	ND	2.5
DI-N-BUTYLPHTHALATE	ND	2.5
FLUORANTHENE	ND	2.5
PYRENE	ND	2.5
BUTYLBENZYLPHTHALATE	ND	2.5
3,3'-DICHLOROBENZIDINE	ND	2.5
BENZO (A) ANTHRACENE	ND	2.5
CHRYSENE	ND	2.5
BIS (2-ETHYLHEXYL) PHTHALATE	ND	12.5
DI-N-OCTYLPHTHALATE	ND	2.5
BENZO (B) FLUORANTHENE	ND	2.5
BENZO (K) FLUORANTHENE	ND	2.5
BENZO (A) PYRENE	ND	2.5
INDENO (1,2,3-CD) PYRENE	ND	2.5
DIBENZ (A, H) ANTHRACENE	ND	2.5
BENZO (G, H, I) PERYLENE	ND	2.5

ND = NOT DETECTED

*: ESTIMATED VALUE, LESS THAN QUANTITATION LIMIT

BRIGGS ASSOCIATES LABORATORY
400 HINGHAM STREET
ROCKLAND, MA 02370

LABORATORY INFORMATION

LABORATORY CERTIFICATION STATUS
Expires December 31, 1990

PRIMARY PARAMETERS AND CATEGORIES

FULL CERTIFICATION: Trace Metals, Nitrate, Fluoride, Pesticides,
Trihalomethanes, Corrosivity Series, Sodium

PROVISIONAL CERTIFICATION: Volatile Organics

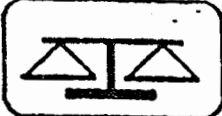
SECONDARY PARAMETERS AND CATEGORIES

FULL CERTIFICATION: Metals, Minerals, Nutrients, Demand,
PCB, Pesticides, Volatile Halocarbons, Volatile
Aromatics, Cyanide, Oil & Grease, Phenolics

PROVISIONAL CERTIFICATION: None at present

All analyses were performed within required holding times, in
accordance with EPA protocols and using accepted QA/QC procedures.
The information contained in this report is, to the best of my
knowledge, accurate and complete. *AC*

BRIGGS ASSOCIATES, INC.
400 HINGHAM STREET
ROCKLAND, MA 02370
(617) 871-6040



CHAIN OF CUSTODY

ANALYSES

CLIENT NAME: <i>Ball Corp.</i>			PROJECT NAME: <i>Ball Corp.</i>															
PROJECT #: <i>6382-MBZ1</i>			COLLECTED BY: <i>CHARLIE McELENEY BRENDAN GILBERTY</i>															
FIELD SAMPLE	COLLECTION DATE / TIME		SAMPLE TYPE	STATION / LOCATION	TOTAL NUMBER OF CONTAINERS	COMPOSITE	GRAB	VOA (<i>40ml</i>)	METALS (<i>50ml</i>)	SEM-VOA (<i>25ml</i>)	Ignitability					REMARKS	LAB I.D.	
	<i>8/19/90</i>	<i>11:30am</i>	<i>INW</i>	<i>Ball Corp. Waste Salem, MA</i>	<i>3</i>		<i>X</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>	<i>✓</i>							
RELEASED BY: <i>Charles McEleney</i>				DATE/TIME: <i>8/30 4:50 PM</i>	RECEIVED BY:				RELEASED BY: <i>Federal Express</i>				DATE/TIME:					
RECEIVED BY:				DATE/TIME:	RCB FOR LAB BY: <i>Alicia M. Reill</i>				DATE/TIME: <i>8/31/90 9:50 AM</i>				SAMPLE TYPES: GL - SOIL YW - WASTEWATER GW - GROUNDWATER DW - DRINKING WATER DL - DIL					

BRIGGS ASSOCIATES, INC.
400 HINGHAM STREET
ROCKLAND, MA 02370
(617) 871-6040

CLIENT NAME: BALL CORP.
SAMPLE TYPE: WASTEWATER
SAMPLE DATE: 8/29/90
DATE RECEIVED: 8/31/90

PROJECT NUMBER: 6388
REPORT DATE: 9/18/90
COLLECTED BY: BRIGGS

TCLP

SAMPLE NUMBER: 11342
SAMPLE LOCATION: BALL CORP. WASTE BALTIMORE

PARAMETER	RESULTS IN MG/L (UNLESS OTHERWISE NOTED)	MAXIMUM ALLOWABLE CONCENTRATION IN MG/L
ARSENIC	<0.25	5.0
BARIUM	<20	100.0
CADMIUM	<0.5	1.0
CHROMIUM	1.5	5.0
LEAD	4.3	5.0
MERCURY	<0.01	0.2
SELENIUM	0.25	1.0
SILVER	<1.0	5.0
IGNITABILITY IN °F	85	>140



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 W. Preston St., Balto. MD 21201

YR MO DY
97 01 10

DHS Inspection Form
Generators/TSD Facilities

TIME
1400

EPA ID Number

MD D9138A12869

TELEPHONE

301-837-6802

Owner/Operator BALL METAL TREATMENT Facility Name SHEPT MET COATING

Address 901 W. COSTEND ST BALTIMORE MD Zip 21230

Description of Work Activity LITHOGRAPHY ON METAL SURFACES

I. Generators

A. Description (10.51.03.01-03)

- 1) Does the Facility generate or has it accumulated those quantities of hazardous waste described in 10.51.02.05 C?
☐ Yes, ☒ No.
- 2) Has the facility obtained an EPA identification number?
☐ Yes, ☒ No.
- 3) Describe the amount of waste generated. (day, week or month)
1000 KG PER MONTH
- 4) Under which category is the waste(s)?
☒ Ignitable ☐ Reactive ☐ Corrosive
☐ EP Toxic ☐ RCRA Listed

B. Manifest (10.51.03.04)

- 1) Is Maryland manifest system in operation for off-site shipment? ☒ Yes, ☐ No.
- 2) Is TSD Facility to receive DHS identified by ☒ Name, ☒ Address, ☒ EPA ID Number?
- 3) Is alternate facility identified? ☐ Yes, ☒ No.
- 4) Is generator identified by ☒ Name, ☒ Address, ☒ Telephone Number, ☒ MD/EPA ID Number?
- 5) Is each transporter identified by ☒ Name, ☒ EPA ID Number, ☒ Maryland Certification Number?
- 6) Is waste properly described? ☐ Yes, ☒ No.
- 7) Is shipment date marked? ☐ Yes, ☒ No.
- 8) Is quantity of waste described by ☐ Unit of Weight, ☒ Volume?
- 9) Are containers to be loaded identified by ☐ Type, ☐ Number?
- 10) Is proper certification noted and signed by generator?
☐ Yes, ☒ No.
- 11) Are adequate copies available for operator, transporter and TSD? ☐ Yes, ☒ No.

C. Pre-Transport Requirements (10.51.03.05)

- 1) Is each container marked with date accumulation began?
☒ Yes, ☐ No. If yes, has any waste been stored over 90 days? ☐ Yes, ☒ No. How much _____
- 2) Are containers in good condition? ☒ Yes, ☐ No. If no, explain _____
- 3) Are containers properly labeled? ☒ Yes, ☐ No.
- 4) Does generator have approved emergency contingency plan? ☐ Yes, ☒ No.

D. Recordkeeping and Reporting (10.51.03.06)

- 1) Does the generator have: copies of all signed manifests from the previous three years? ☒ Yes, ☐ No; copies of each Annual Report and Exception Report?
☒ Yes, ☐ No.
- 2) Does the generator retain, for a period of three years, all wastes analyses? ☒ Yes, ☐ No.
- 3) Has the generator filed Exception Reports as required by 10.51.03.06 C? ☐ Yes, ☒ No.

II. Treatment, Storage, Disposal (TSD)

A. Site characterization (10.51.05.02)

- 1) Facility Type

<input type="checkbox"/> Thermal Treatment	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Waste Oil	<input type="checkbox"/> Incineration
<input type="checkbox"/> Chemical Treatment	<input type="checkbox"/> Landfill Operation
<input type="checkbox"/> Physical Treatment	<input type="checkbox"/> Below Ground Tanks
<input type="checkbox"/> Open Pile	<input type="checkbox"/> Other _____
<input type="checkbox"/> Surface Impoundment	
<input type="checkbox"/> Drums	
<input type="checkbox"/> Above Ground Tank(s)	

- 2) Does facility generate DHS? ☐ Yes, ☒ No.
- 3) Does facility have waste analysis plan? ☐ Yes, ☒ No. If yes, are the procedures of that plan being followed?
☐ Yes, ☒ No.
- 4) Can facility personnel identify DHS being handled?
☐ Yes, ☒ No.
- 5) Can facility personnel confirm that DHS received equal those on manifest for? ☐ Yes, ☒ No.
- 6) Is there a 24-Hour surveillance system to monitor active portion of facility? ☐ Yes, ☒ No. If No, is there an artificial or natural boundary? ☐ Yes, ☒ No. Is there a means to control entry? ☐ Yes, ☒ No. Is there a restricted access sign posted?
☐ Yes, ☒ No.
- 7) Does facility have: ☐ emergency equipment inspection log, ☐ written schedule for inspections, ☐ security devices, operating & structural prevention equipment?
- 8) Have facility personnel completed classroom/on-site training? ☐ Yes, ☒ No. Are records maintained of: NO Job titles/names of employees NO job descriptions, NO Type/amount of continuing training?
- 9) Are general requirements for Ignitable, Reactive or Incompatible Wastes as required in 10.51.05.02 H addressed?
☐ Yes, ☒ No.

B. Preparedness and Prevention (10.51.05.03)

- 1) Facility has the following equipment? ☒ Internal communication/alarms system for on-site personnel, ☒ device for summoning emergency assistance, ☒ adequate fire control equipment, water, & suppression chemicals, NO list of aforementioned equipment.
- 2) Does facility have adequate area for emergency movement?
☒ Yes, ☐ No.

C. Contingency Plan and Emergency Procedures (10.51.05.04)

- 1) Does facility have an approved contingency plan for:
☒ Personnel to implement emergency procedures to fire, explosions, and unplanned releases to air, soil and water?
☒ Responding emergency units to provide assistance during emergency situations?
☒ A list of emergency equipment needed to cope with situation?
- 2) Are emergency response coordinators listed by name, address, & phone number? ☐ Yes, ☒ No.
- 3) Is there an evacuation plan if recommended? ☐ Yes, ☒ No.
- 4) Are emergency coordinators available on twenty-four hour basis? ☐ Yes, ☒ No.

D. Manifest System, Recordkeeping, and Reporting (10.51.05.05)

Facility has a written operating record which contains the following information:

- 1) ☐ description & quantity of DHS received.
- 2) ☐ method & date of DHS treatment, storage, or disposal.
- 3) ☐ location & quantity at each DHS location in facility.
- 4) ☐ detailed records & results of waste analysis & treatability tests performed.
- 5) ☐ detailed operating summary reports.
- 6) ☐ description of emergency incidents that required implementation of contingency plan.
- 7) ☐ records & results of inspections of emergency equipment, TSD systems & hazardous waste areas.
- 8) Has facility retained, for at least 3 years, copies of all manifests? ☐ Yes, ☒ No.

E. Groundwater Monitoring (10.51.05.06)

- 1) Has facility implemented a groundwater monitoring program? ☒ Yes, ☐ No, ☐ N/A.
- 2) Are samples from the groundwater monitoring system being analyzed according to the groundwater sampling and analyses plan? ☒ Yes, ☐ No.
- 3) Is this plan set up in accordance with 10.51.05.06 C? ☒ Yes, ☐ No.
- 4) Has groundwater quality assessment program been prepared? ☒ Yes, ☐ No.
- 5) Are proper groundwater sampling and analyses records kept? ☒ Yes, ☐ No.
- 6) Are the necessary reports on groundwater monitoring information being forwarded to the Secretary? ☒ Yes, ☐ No.
- 7) Do the reports match the facility records? ☒ Yes, ☐ No.

F. Closure, Post-closure, and Financial Requirement (10.51.05.07 & .08)

- 1) Does the facility have an approved closure plan that meets the financial requirements? ☒ Yes, ☐ No.
- 2) For surface impoundments, land treatment, and landfills, does the facility have an approved post-closure plan that meets the financial requirements? ☒ Yes, ☐ No.
- 3) Does facility maintain liability insurance? ☒ Yes, ☐ No.

G. Container Management (10.51.05.09)

- 1) Are all containers: (a) ☒ in good condition, i.e., no signs of leakage, corrosion, or any other deterioration/deformation; (b) ☒ lined or made of compatible material such that hazardous wastes placed into them will not result in reaction or corrosion; (c) ☒ sealed during storage.
- 2) Are storage areas for hazardous waste containers inspected by owner/operator at least once a week? ☒ Yes, ☐ No.
- 3) Is an inspection log maintained? ☒ Yes, ☐ No.
- 4) Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? ☒ Yes, ☐ No.
- 5) Are incompatible wastes placed in separate containers? ☒ Yes, ☐ N/A No.
- 6) Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? ☒ Yes, ☐ N/A No.

H. Tanks (10.51.05.10)

- 1) Are all tanks in good condition, i.e., no signs of leakage, corrosion, or any other deterioration? ☒ Yes, ☐ No.
- 2) Are uncovered tanks operated to ensure a minimum of two feet of freeboard? ☒ Yes, ☐ No. If not, is tank equipped with a containment structure (e.g., dike or trench), a drainage control system, or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of top 2 ft. of the tank? ☒ Yes, ☐ No.
- 3) Are tanks with continuous inflow of hazardous waste equipped with a means to stop this inflow (e.g., waste feed cut-off system or by-pass to a standby tank)? ☒ Yes, ☐ No.
- 4) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into tank used for storage or treatment? ☒ Yes, ☐ No.
- 5) Are daily inspections conducted for discharge control equipment (e.g., by-pass systems, waste feed cut-off systems and drainage systems)? ☒ Yes, ☐ No.
- 6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day? ☒ Yes, ☐ No.
- 7) Is the level of waste in the tank checked at least once each operating day? ☒ Yes, ☐ No.
- 8) Is (are) the tank(s) inspected weekly to detect corrosion or leaking of fixtures or seams? ☒ Yes, ☐ No.
- 9) Are the results of these inspections recorded in an inspection log or summary? ☒ Yes, ☐ No.
- 10) Are ignitable or reactive wastes stored in tanks? ☒ Yes, ☐ No. If yes:
 - a) Is the waste treated, rendered, or mixed before or immediately after placement in the tank so that the resulting waste, mixture, or dissolution of materials no longer meets the definition of ignitable or reactive wastes under Parts 261.21 or 261.23 of the RCRA Regulations? ☒ Yes, ☐ No.

- b) Is waste stored or treated in such a way that it is protected from material or conditions which may cause the waste to ignite or react? ☒ Yes, ☐ No.
- c) Is owner/operator of a facility which treats or stores ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Association's (NFPA's) buffer zone requirements for tanks contained in tables 2-1 through 2-6 of the "Flammable and Combustible Code—1977"? ☒ Yes, ☐ No.

I. Surface Impoundments (10.51.05.11)

- 1) Is two feet of freeboard maintained in the surface impoundment? ☒ Yes, ☐ No.
- 2) Do all earthen dikes have protective covers (e.g., grass, shale or rock) to minimize wind and water erosion and to preserve dike structural integrity? ☒ Yes, ☐ No.
- 3) Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment? ☒ Yes, ☐ No.
- 4) Is the freeboard level inspected daily? ☒ Yes, ☐ No.
- 5) Is the surface impoundment, including dikes and vegetation, inspected weekly to detect leaks, deterioration, or failures in the impoundment? ☒ Yes, ☐ No.
- 6) Are the results of these inspections recorded in an inspection log or summary? ☒ Yes, ☐ No.
- 7) Are ignitable or reactive wastes stored in a surface impoundment? ☒ Yes, ☐ No. If yes:
 - a) Is the waste treated, rendered, or mixed before or immediately after placement in the impoundment so that the resulting waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste under Parts 261.21 or 261.23 of the RCRA Regulations? ☒ Yes, ☐ No.
 - b) Are incompatible wastes segregated in separate surface impoundments so that spontaneous reactions are avoided? ☒ Yes, ☐ No.

J. Waste Pile (10.51.05.12)

- 1) Is wind dispersal of the pile controlled? ☒ Yes, ☐ No, ☐ Not Needed.
- 2) Are additions to the pile being analyzed prior to adding them to the pile? ☒ Yes, ☐ No.
- 3) Is hazardous waste leachate or runoff collected? ☒ Yes, ☐ No. Is the pile protected from precipitation and runoff? ☒ Yes, ☐ No.
- 4) Are ignitable or reactive wastes protected from materials or conditions that might cause it to ignite or react? ☒ Yes, ☐ No, ☐ N/A.
- 5) Are incompatible wastes hauled in a manner as to assure separation? ☒ Yes, ☐ No, ☐ N/A.

K. Land Treatment (10.51.05.13)

- 1) Will the use of land treatment result in the waste being less hazardous or non-hazardous? ☒ Yes, ☐ No.
- 2) Is run-on diverted away from the active portion of the facility? ☒ Yes, ☐ No. Is run-off from the active portion of the facility collected? ☒ Yes, ☐ No.
- 3) Has the proper waste analyses been performed? ☒ Yes, ☐ No.
- 4) If food chain crops are to be grown on the active portion of the facility has the necessary documentation required been provided? ☒ Yes, ☐ No.
- 5) Has the owner/operator written and implemented an unsaturated zone monitoring plan? ☒ Yes, ☐ No.
- 6) Have the additional requirements for a closure and post-closure plan been addressed? ☒ Yes, ☐ No.
- 7) Are ignitable or reactive wastes immediately incorporated into the soil? ☒ Yes, ☐ No.
- 8) Are incompatible wastes hauled according to 10.51.05.13 I? ☒ Yes, ☐ No.

L. Landfills (10.51.05.14)

- 1) Is run-on diverted away from the facility's active portions? ☒ Yes, ☐ No.
- 2) Is run-off collected from the landfill's active portions? ☒ Yes, ☐ No.
- 3) Has a hazardous waste determination been made on the run-off? (Identification and Listing of Hazardous Waste) ☒ Yes, ☐ No.
- 4) Is the landfill managed so as to control wind dispersal? ☒ Yes, ☐ No.

- 5) Are the following items maintained in the operating record: _____ on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks? _____ contents of each cell and approximate location of each hazardous waste type within the cell?
- 6) Are bulk, non-containerized or waste containing free liquids placed in the landfill? _____ Yes, _____ No. If yes: _____ is a leachate collection system available to remove leachate?, and _____ is the liquid stabilized or treated physically or chemically prior to disposal?
- 7) Are empty containers crushed flat or shredded before burial in the landfill? _____ Yes, _____ No.
- 8) Are containers holding liquid wastes (or waste containing free liquids placed in the landfill? _____ Yes, _____ No. If yes, describe containers on comments below.
- 9) Are ignitable or reactive wastes placed in a landfill? _____ Yes, _____ No. If yes: _____ Is the waste treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste? _____ Are incompatible wastes segregated in different landfill cells?

M. Incinerator/Thermal Treatment (10.51.05.15 & .16)

- 1) Prior to burning waste not previously incinerated or thermally processed, does the operator conduct waste analysis for the following:
 _____ heating value of the waste;
 _____ halogen content and sulfur in the waste;
 _____ concentrations of lead and mercury unless documented data is available which show these elements not to be present?
- 2) Are instruments related to combustion and emission control monitored at least every 15 minutes? _____ Yes, _____ No.
- 3) Is the stack plume observed visually at least hourly for color and opacity? _____ Yes, _____ No, _____ N/A.
- 4) Is the incinerator or thermal process and associated equipment inspected daily for leaks, spills and fugitive emissions? _____ Yes, _____ No.
- 5) Is all of the above information documented in the facility's operating record? _____ Yes, _____ No.

N. Chemical, Physical and Biological Treatment (10.51.05.17)

- 1) Are all treatment processes or equipment in good condition, i.e., no signs of leakage, corrosion or any other deterioration? _____ Yes, _____ No.
- 2) Are treatment processes or equipment with continuous inflow of hazardous waste equipped with a means to stop the inflow? (e.g., waste feed cutoff system or bypass system to a standby containment device) _____ Yes, _____ No.

- 3) Are waste analyses performed or written documentation obtained before placing a substantially different hazardous waste into treatment processes or equipment? _____ Yes, _____ No.
- 4) Is this information recorded in the facility's operating record? _____ Yes, _____ No.
- 5) Are daily inspections conducted for discharge control equipment (e.g., bypass systems, waste feed cutoff systems, drainage systems and pressure relief systems)? _____ Yes, _____ No.
- 6) Is data gathered from monitoring equipment (e.g., pressure and temperature gauges) daily? _____ Yes, _____ No.
- 7) Are construction materials of the treatment process or equipment and the immediate surrounding area inspected weekly for signs of leakage, corrosion or any other deterioration? _____ Yes, _____ No.
- 8) Are the results of these inspections recorded in an inspection log or summary? _____ Yes, _____ No.
- 9) Are ignitable or reactive wastes placed in a treatment process? _____ Yes, _____ No. If yes:
 _____ Are wastes treated, rendered, or mixed before or immediately after placement in the treatment process or equipment so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive wastes under Section 261.21 or 261.23 of the RCRA Regulations?
 _____ Are wastes treated in such a way that they are protected from any material or conditions which may cause the waste to ignite or react?
- 10) Are incompatible wastes kept from being placed in the same treatment process or equipment? _____ Yes, _____ No.

O. Permit Requirements (10.51.07)

- 1) Does the facility have a DHS permit for its activity? _____ Yes, _____ No.
 If no, has the facility submitted an application for a DHS permit? _____ Yes, _____ No.
- 2) List any special Permit requirements that are not in full compliance.

Comments: SINCE THE LAST INSPECTION THERE HAVE BEEN AT LEAST 12 SHIPMENTS OF HAZARDOUS WASTE. AN INSPECTION OF THE CONTAINMENT AREA REVEALED 5 DRUMS OUTSIDE OF THE AREA, THE DRUMS WERE PLACED IN CONTAINMENT DURING MY INSPECTION. ALTHOUGH INSPECTIONS ARE CONDUCTED, NO LOG IS MAINTAINED. A LOG OF WEEKLY INSPECTIONS MUST BE MAINTAINED. DRUMS IN SATELLITE ACCUMULATION MUST BE LABELED AS HAZARDOUS WASTE.

AN UNIDENTIFIED DRUM IN THE MAINTENANCE YARD IS IN A POSITION LIKELY TO POLLUTE WATERS OF THE STATE ALSO OIL SPILLAGE MUST BE CLEANED FROM THE AREA AROUND THE STORM DRAIN.

A CONTINGENCY PLAN MUST BE COMPLETED AND FILED

Inspector's Name: VALERIE DOYLE Title: INSPECTOR

Facility Location: 901 W. OSTEND ST. BALTIMORE MD 21230

Facility Rep. present during inspection: JOSEPH J. SANNILLO Title: PLANT SUPERINTENDENT



State of Maryland
Department of Health and Mental Hygiene
Office of Environmental Programs
201 West Preston Street, Baltimore, Maryland 21201

Report of Observations

Type of Inspection/Observations: RCRA Date 1/16/87

Facility Name: BALL METAL DECORATING

Remarks: WITH THE APPROPRIATE AGENCIES, PERSONNEL
TRAINING MUST BE CONDUCTED AND RECORDS PLACED
ON FILE AS REQUIRED.

SEE SITE COMPLAINT SC-O-157 FOR COMPLIANCE
SCHEDULE.

Observer: VALERIE DOYLE

Person Interviewed: R. D. [Signature]



STATE OF MARYLAND
DEPARTMENT OF HEALTH AND MENTAL HYGIENE
OFFICE OF ENVIRONMENTAL PROGRAMS
P.O. BOX 13387
201 W. PRESTON STREET
BALTIMORE, MARYLAND 21203
(301) 383-6650

SITE COMPLAINT

NUMBER	DATE
SC-0- 87-157	1/15/87

1. Name of violator: BALL METAL DECORATING
Address: 901 W. OSTEND ST. BALTIMORE MD 21230
County: BALTIMORE CHY Phone: 837-6800

2. Violation Type (with reference to Maryland Code)

☒ Water Pollution Control and Abatement (Health Environmental Article, Sections 9-301 through 9-344)

☒ Controlled Hazardous Substances (Health Environmental Article, Sections 7-201 through 7-268)

☐ Landfills and Sludge Disposal (Health Environmental Article, Section 9-210)

☐ Other

3. Specifically: UNIDENTIFIED DRUM NEAR STORM DRAIN AND OIL
SPILLAGE IN A POSITION LIKELY TO POLLUTE WATERS OF THE
STATE.

NO CONTINGENCY PLAN, NO PERSONNEL TRAINING, NO
INSPECTION LOG DONE WEEKLY

4. The existence of the above-mentioned violation(s) may subject you to prosecution and penalty. Accordingly, you are advised that the following corrective actions are necessary to remedy the violation(s).

IMMEDIATELY REMOVE DRUM TO CONTAINMENT AREA, IDENTIFY AND HANDLE AS
NECESSARY WITHIN 90 DAYS OR BY APRIL 18, 1987 IMMEDIATELY CLEAN UP
SPILLAGE, IMMEDIATELY BEGIN INSPECTION LOG WITHIN 90 DAYS OR BY
APRIL 18, 1987 COMPLETE A CONTINGENCY PLAN AND PERSONNEL TRAINING
DOCUMENT TRAINING AS REQUIRED.

5. Continuation of the violation(s) or failure to take the corrective action described above may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties.

6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt."

Person issued to: JOSEPH SENNELLO

Title: PLANT SUPERINTENDENT

Authorized by: William Eichbaum
Assistant Secretary for
Environmental Programs

Issued by: Valerie Doyle
Inspector

Phone: 225-5731